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Honorable Timothy W. Dore
Chapter 7
Hearing Location: Seattle, Rm. 8106
Hearing Date: May 17, 2024
Hearing Time: 9:30 a.m.
Response Date: May 10, 2024

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re:

WIRELESS ADVOCATES, LLC

Debtor.

Case No. 23-10117-TWD

**NOTICE OF HEARING ON
CHAPTER 7 TRUSTEE'S SIXTH
MOTION FOR ENTRY OF AN
ORDER, PURSUANT TO 11 U.S.C. §
365(d), EXTENDING TIME TO
ASSUME OR REJECT EXECUTORY
CONTRACTS**

TO: WIRELESS ADVOCATES, LLC, LLC, Debtor;
AND TO: UNITED STATES TRUSTEE;
AND TO: SPECIAL NOTICE LIST;
AND TO: PARTIES ENTITLED TO NOTICE UNDER CASE MANAGEMENT ORDER

PLEASE TAKE NOTICE that a hearing has been scheduled on **May 17, 2024 at 9:30 a.m. (PT)** before the Honorable Timothy W. Dore, United States Bankruptcy Judge, in Courtroom 8106, 700 Stewart Street, Seattle, WA, 98101 on the Chapter 7 Trustee's Sixth Motion for Entry of an Order Pursuant to 11 U.S.C. § 365(d), Extending Time to Assume or Reject Executory Contracts (the "Motion").

By this Motion, the Trustee respectfully requests the entry of an order pursuant to 11 U.S.C. § 365(d) extending the deadline to assume or reject the executory contracts identified in Exhibit A through and including July 31, 2024.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and related documents may be (1) reviewed and copied at the Clerk of the United States Bankruptcy Court, 700 Stewart Street, Seattle, WA 98101 or (2) may be obtained by submitting a written request to Ms. Denise Lentz, Paralegal, K&L Gates, LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158, Email: denise.lentz@klgates.com.

NOTICE OF HEARING ON CHAPTER 7 TRUSTEE'S
MOTION FOR ENTRY OF AN ORDER, PURSUANT TO
11 U.S.C. § 365(d), EXTENDING TIME TO
ASSUME OR REJECT EXECUTORY CONTRACTS - 1

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TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 PLEASE TAKE FURTHER NOTICE THAT IF YOU OPPOSE the Motion, you must file
2 your written objection NO LATER THAN **Friday, May 10, 2024**. Objections must be filed with the
3 Court, 700 Stewart Street, Seattle, WA, 98101, and a copy delivered to:

4 Ruby A. Nagamine
5 K&L Gates, LLP
6 925 Fourth Avenue, Suite 2900
7 Seattle, Washington 98104

8 PLEASE TAKE FURTHER NOTICE that in accordance with Local Bankruptcy Rule 9013-
9 1(d)(7), failure to timely file and serve an objection to the Motion may be deemed by the Court an
10 admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy
11 Rule 9013-1(e), failure to appear at the hearing on the Motion may be deemed by the Court to be an
12 admission that any opposition to the Motion is without merit. Further, pursuant to Local Bankruptcy
13 Rule 9013-1(f), if no opposition to the Motion is timely filed and served, the Court may either (a) grant
14 the Motion by default at the hearing, or (2) grant the Motion prior to the hearing on the Trustee's ex
15 parte presentation of a proposed order accompanied by proof of service and a declaration that no
16 objection to the Motion was timely received.

17 DATED this 12th day of April, 2024.

18 K&L GATES LLP

19 /s/ Ruby A. Nagamine

20 Michael J. Gearin, WSBA # 20982

21 Brian T. Peterson, WSBA # 42088

22 Ruby A. Nagamine, WSBA #55620

23 K&L GATES LLP

24 925 Fourth Avenue, Suite 2900

25 Seattle, WA 98104-1158

26 Telephone: (206) 623-7580

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*Attorneys for Virginia Burdette, Chapter 7
Trustee*

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EXHIBIT A

1	DIGITAL FORTRESS	IT
2	MICROSOFT - AZURE CLOUD SERVICES	IT
3	MICROSOFT ENTERPRISE AGREEMENT (EA)	IT
4	MICROSOFT SERVER CLOUD ENROLLMENT (SCE)	IT
5	PALO ALTO	IT
6	VM WARE	IT
7	CISCO (SUPPORT)	IT
8	QUEST	IT

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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a paralegal in the law firm of K&L Gates LLP, and on April 12, 2024, she caused
4 the foregoing document to be filed electronically through the CM/ECF system which caused
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic
6 Filing.

7 I declare under penalty of perjury under the laws of the State of Washington and the United
8 States that the foregoing is true and correct.

9 Executed on the 12th day of April, 2024 at Seattle, Washington.

10 /s/ Denise Lentz
11 Denise Lentz
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